

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:14-CR-367-B

CASEY ROSE (26)

21 U.S.C. § 851 PENALTY ENHANCEMENT INFORMATION
AND NOTICE OF INTENTION TO SEEK ENHANCED PENALTY

The United States Attorney charges:

1. Before committing the offense alleged in Count One of the Second Superseding Indictment, returned on June 24, 2015, Casey Rose was convicted of the following predicate drug offenses:

- A) Unlawful Possession with Intent to Deliver a Controlled Substance to Wit: Methamphetamine of 4 Grams or More but Less than 200 Grams, in Cause Number F-9821112-UQ, in 204th Judicial District Court of Dallas County, Texas, with an offense date of March 7, 1998, and with a judgment entered on October 15, 1998.
- B) Unlawful Possession with Intent to Deliver a Controlled Substance to Wit: Lysergic Acid Dithylamide of less than 20 Abusable Units, in Cause Number F-9821113-Q, in 204th Judicial District Court of Dallas County, Texas, with offense date of March 7, 1998, and with a judgment entered on October 15, 1998.
- C) Unlawful Possession with Intent to Deliver a Controlled Substance to Wit: Amphetamine of 4 Grams or More But less than 400 Grams, in Cause Number F-9821114-UQ, in 204th Judicial District Court of Dallas County, Texas, with offense date of March 7, 1998, and with a judgment entered on October 15, 1998.
- D) Engaging in Organized Crime § 71.02 of the TPC (First Degree), in Cause

Number 19008-B, in the 181st District County of Randall County, Texas, with an offense date of April 22, 2006, and with a judgment entered on October 1, 2007.

- E) Possession of a Controlled Substance, Enhanced, in Cause Number 18101-B, in the 181st District County of Randall County, Texas, with an offense date of May 22, 2006, and with a judgment entered on October 1, 2007.

2. The convictions alleged in paragraph one (subparagraphs A through E) became final before Rose committed the offense alleged in Count One of the Second Superseding Indictment.

3. Rose's prior convictions subject him to the enhanced penalties provided for repeat offenders in 21 U.S.C. § 841(b)(1)(A).

4. The United States Attorney serves notice that, upon conviction of the defendant of Count One of the Second Superseding Indictment, the United States will seek to invoke the enhanced penalty provisions and subject the defendant to the following penalties:

- a. imprisonment for life without release;
- b. a fine not to exceed \$20,000,000 or twice the pecuniary gain to the defendant or loss to the victim;
- c. a term of supervised release of not less than 10 years shall follow any term of imprisonment. If the defendant violates any condition of supervised release, the defendant could be imprisoned for the entire term of supervised release;
- d. a mandatory special assessment of \$100;
- e. restitution to the victims of his crimes, including community restitution;
- f. denial of certain federal benefits, as defined in 21 U.S.C.

§ 862(d), for a period of 10 years;

- g. Permanent ineligibility for assistance under any state program funded under part A of Title IV of the Social Security Act; and
- h. Permanent ineligibility for benefits under the food stamp program or any state program carried out under the Food Stamp Act of 1977.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

/s P.J. Meitl

P.J. MEITL

Assistant United States Attorney
District of Columbia Bar No. 502391
Virginia Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8680
Facsimile: 214.659.8812
Email: philip.meitl@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2015, I electronically filed the foregoing document with the clerk for the United States District Court for the Northern District of Texas pursuant to its electronic filing system (ECF). The ECF sent a “Notice of Electronic Filing” to the attorneys of record who have consented to accepting service via this method.

In addition, Special Agent Eric Wilson of the Department of Public Safety or other agents working under his direction will personally serve this notice on the defendant, Casey Rose.

/s P.J. Meitl

P.J. MEITL

Assistant United States Attorney